

# EXHIBIT C

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1           A.       I mean, typically, you know,  
2 decisions came from the executive level --

3           Q.       All right.

4           A.       -- so, you know.

5           Q.       And who -- who was at the  
6 executive level that would -- you recall having  
7 discussions regarding COVID-19 work  
8 accommodations?

9           A.       So I don't recall having a  
10 conversation with Lou, but she would make ultimate  
11 decisions.

12          Q.       Okay.

13          A.       So I'm not sure how the  
14 information got relayed to me.

15          Q.       I mean, do you recall ever being  
16 in the same room as Lou?

17          A.       Sometimes.

18          Q.       Okay.

19          A.       It wasn't often.

20          Q.       Okay. Do you recall, like,  
21 trying to figure out what to do as the world came  
22 down around everybody because of the pandemic?

23          A.       Like, it is a blur.

24          Q.       Did you get in a room and have  
25 any conversations with Lou Taylor about -- during

1 where I kept different e-mails. But I don't  
2 remember if I had an e-mail for -- a folder for,  
3 you know, work-from-home or pandemic. I don't  
4 remember.

5 Q. If you want to go to the next  
6 exhibit. Actually, we're going to skip. We're  
7 going to go to 5. Make sure you're on -- I want  
8 to make sure you're on 5.

9 A. This (indicating)? Exhibit 5?

10 Q. At the bottom of the page, it  
11 should be 123.

12 Okay. All right. Do you see in  
13 the middle of page 123, there is -- it says, on  
14 March 17th, 2020 at 4:05 p.m., you wrote: Hi  
15 Lou."

16 Do you see that?

17 A. Yes.

18 Q. And here you write: "I have  
19 received doctors' notes from each person listed  
20 validating that they do have valid concerns."

21 A. Yes.

22 Q. What do you mean by that? What  
23 do you recall?

24 A. That they would have had doctors'  
25 notes that could have allowed them to be

1 accommodated.

2 Q. What do you mean by that?

3 A. Well, that they may qualify for  
4 one of the options that we were given at that  
5 time.

6 Q. And what were those options?

7 A. Well, I think it was previously  
8 -- work-from-home or a different work schedule.

9 Q. Any other options that you  
10 recall?

11 A. No, not that I remember.

12 Q. Do you recall employees being  
13 given alternative -- alternative work schedules in  
14 response to the pandemic?

15 A. I remember it being discussed.

16 Q. With who?

17 A. I don't remember who was a part  
18 of the meeting.

19 Q. Okay. Do you remember a single  
20 participant of the meeting?

21 A. No.

22 Q. All right. Do you recall when  
23 that meeting took place?

24 A. No.

25 Q. Do you remember where that